

Tillig, Louise

From: Bronwyn Gallacher <bronwyn@cclconsultants.com.au>
Sent: Wednesday, 8 April 2015 5:28 PM
To: Shanks, Tanya
Cc: 'compliance@aldi.com.au'
Subject: Shower Gel - Mandatory Report 9922 - Additional Information
Attachments: 08 04 2015 MR9922 Prince Shower Gel for Men (4).doc; 5662 Prince Shower Gel Oxygen 1L.PDF

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Tanya,

I hope you are well.

Please find attached the response prepared by ALDI and Trendpac in relation to the Prince Shower Gel product, and the chemical product specification. I also wish to advise that ALDI has not subsequently received any additional concerns and/or complaints from customers about this product since our last communications.

If you wish to discuss this matter, please do not hesitate to contact me on 0433 2929 777.

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Product Code:	5662	Brand Name:	PRINCE®
Product Name:	PRINCE® Shower Gel for Men, 1L	ALDI Commodity Group: Sub-commodity group:	07 - Health & Beauty 02 - Soaps & Shower Gel
Product Description:	Oxygen Hydrating Shower Gel		
Inner Packaging Requirements			
Requirement	Specification		
Material Type	Clear 5PP bottle, fitted with a 33/410 PP lotion pump and front and back labels		
Dimensions (retail package)	252mm (H) x 110mm (W) x 67mm (L) (TBC)		
List any Special Properties (recyclability, print spec, etc)	Recyclable Logo		
Outer Packaging Requirements			
Requirement	Specification		
Case Quantity	9 x 1L		
Maximum carton depth (length)	TBC		
Maximum carton height	TBC		
Carton Structure	TBC		
Carton Lip Height	TBC		
Double White Lined (Yes/No)	TBC		
Print - Type	Litho		
Print - No. of Colours	TBC		
Print - Gloss or Varnish	TBC		
Other (Material type, recyclable)	Packaging carton made from recycled material.		
Image of Ideal Carton Structure			
Shelf Life & Storage			
Requirement	Specification		
Shelf Life from DOM	2 years		
Storage Conditions	Store below 30°C away from direct sunlight.		
Physical Specification			
Requirement	Specification		
Active Ingredients	% Anionic (MW 388), 9.00 - 10.00		
Viscosity	5,000 - 8,000 cps (Brookfield LVT, Sp.3,12rpm at 23°C)		
Sensory Specification			
Attribute	Acceptable Limits		
Appearance	Clear, viscous gel with suspended white beads and trapped bubbles		
Colour	Light blue		
Fragrance	Fresh, clean aqua citrus (TBC)		
Texture	Smooth, homogenous gel		
Chemical Specification			
Test	Acceptable Limits		
pH (neat)	5.0 - 6.0		
Total Solids (%Dry Content)	10.4 - 12.0 at 145°C		
Specific Gravity	1.000 - 1.020 at 23°C		
Cloud Point	n/a		
Microbial Specification			
Test	Acceptable Limits		
Total Viable Count (TVC)	<100 cfu/g or ml		
Yeast, Moulds	Absence/ g		
Staphylococcus aureus	Absence/ g		
Pseudomonas aeruginosa	Absence/ g		
Escherichia coli	Absence/ g		
Salmonella	Absence/ g		
Others			
Corporate Responsibility			
Item (as required)	Specification		
Formaldehyde	Free Formaldehyde levels in chemicals must be outside of limits specified in Poison Standards 2012.		
Phosphate Free Laundry Products	Aldi branded laundry detergents and powder products do not contain phosphates.		
Sustainable Palm Oil(non-food products)	All palm oil, palm kernel oil and their derivatives used for Aldi branded products will be from sustainable sourcing.		
Animal Testing	Exclusion of animal testing on finished products.		

Product Claims	
Item (as required)	
pH Balanced	Contains moisture beads, herbal extracts and a fresh fragrance to give your body an instant revival, leaving skin feeling smooth and soft.
Dermatologically tested	Clean fresh fragrance
Soap Free	Hydrating and moisturising
with Moisture Beads & Herbal Extracts	Natural blend of herbs and minerals
	The surfactants in this product are readily biodegradable and comply with Australian Standard AS4351
	Made in Australia
	Australian Made logo
	Recyclable logo
	*Confirm technical acceptability of claims
Codes of Practice	
Applicable Code(s) of Practice	
Ingredients used must conform to the minimum requirements of:	
<ul style="list-style-type: none"> • NICNAS (National Industrial Chemicals Notification and Assessment Scheme) • IFRA (International Fragrance Association) • Biodegradability of surfactants according to Australian Standard AS4351 	
Product must conform to the applicable requirements of:	
<ul style="list-style-type: none"> • Trade measurement regulations 	
Date of Issue:	27.10.2014
Version No:	
Reason for Update:	New Document
Document Owner:	Quality Assurance
Buying Director Approval:	Deborah Heng

08 April 2015

Re: ALDI Prince Shower Gel for Men, 1L; (MR9922) - Additional Information

ACCC: Questions that may require input from both ALDI and Trendpac:

	Response
1. Does ALDI have specification documents for the product and if so, could you please forward them?	ALDI Stores: Please find the document attached.
2. Does ALDI or the up-stream supplier of the goods conduct regular inspections of batches of the goods, and if so, at what stages of production and distribution are the goods inspected? For example, are production-line tests conducted, pre-shipment inspections carried out, batch tests performed, etc.?	Trendpac: All raw materials used are checked via the Certificate of Analysis from their respective suppliers. The bulk material once made at Trendpac is tested in Trendpac's chemical laboratory before being released.
3. Have there been any other incidents or injuries associated with this product that have been reported to ALDI or Trendpac?	ALDI Stores: <ul style="list-style-type: none"> • 1 female customer complaint, product (Batch# 580575, DOM: 26/11/2014) squirted into her eyes on 25/01/2015. <i>ALDI Case Ref Number: 00383942.</i> This was reported to ACCC per procedure. <ul style="list-style-type: none"> • A trend analysis shows that no other complaints have been received of similar nature from 482,353 units sold between 1/02/2014 - 1/01/2015. Trendpac: None received.
4. Does Aldi seek evidence that Quality Management Systems are in place with all suppliers of goods that ALDI sells? If so, under what circumstances of supply and in what form?	Trendpac: Yes, we are audited to WQA, APVMA and other Good Manufacturing Practices (GMP) standards by customers. ALDI Stores: As per ALDI Supplier Requirements all production facilities of ALDI chemical products are required to be certified to a safety and quality standard specific to the industry sector.
5. What other products does Trendpac supply to ALDI?	Trendpac: Various others including hand washes, multipurpose cleaners, dishwashing liquids, prewash stain removers etc.

ACCC: These questions I believe are Trendpac specific.

	Response
1. How many batches of the product in total were distributed through ALDI stores?	Trendpac: <ul style="list-style-type: none"> • Only 1 Batch <i>recalled</i> = B# 583048; • Only 1 customer complaint (Ref No: 00383942) = B# 580575. (Batch No. 580575 produced translates to 10,000 units with no consumer complaints of similar nature or any kind of quality dissatisfaction.) <ul style="list-style-type: none"> • In total, 482,353 units sold between 1/02/2014 - 1/01/2015.

<p>2. Have any retail samples been tested to date or only retention samples?</p>	<p>Trendpac:</p> <ul style="list-style-type: none"> • Batch 583048 has the following pH profile on the stock returned from ALDI: @ 20:20 pH = 8.64 @ 02:24 pH = 9.53 @ 06:21 pH = 8.52 @ 06:59 pH = 9.78 ~ <i>higher than specifications, failed</i> • Batch 580575, retention sample due to complaint: =5.7 when tested on 26/11/14, = 5.8 when (re)tested on 4/2/15 ~ <i>still within specifications, complies</i>
<p>3. Have there been any other incidents or injuries associated with this product that have been reported to Trendpac?</p>	<p>ALDI Stores & Trendpac: Refer to #3 above.</p>
<p>4. What is the product's pH supposed to be according to the product specifications?</p>	<p>ALDI Stores & Trendpac: 5.0 - 6.0</p>
<p>5. What is the affected batch's pH level?</p>	<p>Trendpac: • Refer to #2 above.</p>
<p>6. How does TrendPac account for the product's variation from product specifications?</p>	<p>Trendpac:</p> <ul style="list-style-type: none"> • Batch# 583048 with high pH was due to incomplete neutralization/mixing resulting to non-uniform pH distribution within the tank specific to this batch only. • Trendpac has initiated the recall as corrective action and prudent decision having identified the problem. • Trendpac: To date (07/04/2015) there has not been any customer complaint from units sold of this batch. • Trendpac: Corrective Actions: <ul style="list-style-type: none"> - <i>Batch processing</i>- additional supervision by QA from start to end to ensure critical points during mixing are strictly observed given the rheology of the product that affects in-process pH adjustments. '- <i>Bulk Testing</i> - sampling from 3points (top, middle, bottom) within the mixing tank for QC testing prior to filling. '- <i>Finished Product/Filling Line</i> - samples are checked against finished product specifications prior to release. Retained samples are rechecked versus shelf life claim per schedule.